



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JENNIFER MAZZARELLO

*

Plaintiff

*

v.

*

Civil Action No. AMD 02 CV 3576

LUCENT TECHNOLOGIES, INC.

*

Defendant

*

* * * * *

CONSENT MOTION FOR ENLARGEMENT OF TIME

Jennifer Mazzarello, Plaintiff, by and through her attorneys, Paul V. Bennett and James E. Zuna, Jr., hereby requests, pursuant to Federal Rules of Civil Procedure, Rule 6(b) and Local Rule 105.9, an enlargement of time in which to respond to Lucent Technologies, Inc., Defendant's, Motion for Summary Judgment and for cause states:

1. That Defendant filed on or about April 24, 2003 a Motion for Summary Judgment.
2. That Plaintiff's Opposition to Defendant's Motion for Summary Judgment is to be filed with this Court no later than May 19, 2003.
3. That Counsel for Plaintiff has been diligent in preparing a response to Defendant's Motion for Summary Judgment. However, counsel for Plaintiff has encountered difficulties in obtaining executed affidavits in support of Plaintiff's Opposition to Defendant's Motion For Summary Judgment. As a result, Plaintiff requires an additional 24 hours in which to respond to Defendant's Motion for Summary Judgment.
5. That counsel for Defendant does not object to an enlargement of time in which Plaintiff shall respond to Defendant's Motion for Summary Judgment no later than Tuesday, May 20, 2003.



WHEREFORE, Jennifer Mazzarello, Plaintiff, hereby requests that this Honorable Court grant an enlargement of time, and that Plaintiff be permitted to file her Response to Defendant's Motion for Summary Judgment no later than May 20, 2003.

Respectfully Submitted,

/s/

James E. Zuna, Jr., Esq.
Law Office of Paul V. Bennett
133 Defense Highway, Suite 209
Annapolis, Maryland 21401
(410) 974-6000
Federal Bar No: 15690

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of May, 2003 that a copy of the foregoing Motion for Enlargement of Time was sent by facsimile and by electronic filing to Robert R. Niccolini, Esquire, McGuire-Woods, LLP, 7 St. Paul Place, Suite 1000, Baltimore, Maryland 21202, Attorney for Defendant.

/s/

James E. Zuna, Jr., Esq.